

UNITED STATES DISTRICT COURT
THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

BROADCAST MUSIC, INC.;)
CONCORD MUSIC GROUP, INC. d/b/a)
JORDAN MUSIC; CYANIDE)
PUBLISHING, JAY-BOY MUSIC CORP.)
UNIVERSAL-SONGS OF POLYGRAM)
INTERNATIONAL, INC.; FUEL)
PUBLISHING INC. d/b/a PENER PIG)
PUBLISHING; BMG RIGHTS)
MANAGEMENT (US) LLC d/b/a BMG)
PLATINIUM SONGS (US),)
)
Plaintiffs,)
)
v.)
)
COTTAGE STREET CREW, LLC d/b/a)
HARLEY’S ROADHOUSE; and)
CHRISTOPHER SCRUDATO, individually,)
)
Defendants.)
_____)

NOW COMES THE Defendants, pursuant to Rule 12 of the Federal Rules for Civil Procedure, answering the Complaint alleging copyright infringement by responding as set forth below, and raises affirmative defenses as follows:

JURISDICTION AND VENUE

1. The Defendants admit the allegations of the nature of the case in paragraph 1;
2. The Defendants admit the allegations of venue in paragraph 2;

PARTIES

3. Answering paragraph 3 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
4. Answering paragraph 4 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
5. Answering paragraph 5 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;

6. Answering paragraph 6 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
7. Answering paragraph 7 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
8. Answering paragraph 8 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
9. Answering paragraph 9 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
10. The Defendant admits the allegations contained in paragraph 10;
11. The Defendant admits the allegations contained in paragraph 11;
12. The Defendant denies the allegations contained in paragraph 12;
13. The Defendant denies the allegations contained in paragraph 13;
14. The Defendant denies the allegations contained in paragraph 14;
15. The Defendant denies the allegations contained in paragraph 15;

CLAIMS OF COPYRIGHT INFRINGEMENT

16. The Defendant repeats and reasserts each and every response contained in paragraphs 1 through 15;
17. Answering paragraph 17 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
18. Answering paragraph 18 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
19. Answering paragraph 19 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
20. Answering paragraph 20 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
21. Answering paragraph 21 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;
22. Answering paragraph 22 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;

23. Answering paragraph 23 of the Complaint, the Defendant lacks information sufficient to form a belief as the facts alleged, and on that basis, the Defendant denies them;

24. The Defendants deny the allegations contained in paragraph 24;

WHEREFORE, the Defendants, request that:

- (I) The Plaintiffs be denied any relief in regards to 17 U.S.C. Section 502;
- (II) The Plaintiffs be denied any monetary damages claimed under 17 U.S.C. Section 504(c);
- (III) The Plaintiffs be denied any costs regarding attorney fees pursuant to 17 U.S.C. Section 505;
- (IV) The Plaintiffs be denied any other relief pursuant to this cause of action; and
- (V) The Defendant in turn request of jury trial on this matter.

DATE: June 10, 2019

/s/Cheveron T. Scott
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